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May 7, 2018

BY ECF

The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. David Blaszczak et al., No. 17 Cr. 357 (LAK)

Dear Judge Kaplan:

We write on behalf of Christopher Worrall to respectfully request that Mr. Worrall be permitted to travel to Orlando, Florida with his wife on May 8, returning May 11. As the Court is aware, Mr. Worrall has at all times been compliant with all aspects of his bail conditions; while Mr. Worrall was found guilty last week on two of sixteen counts with which he was charged, we respectfully submit that his “risk of flight” is not higher than it was prior to the trial in this matter. We apologize for the last-minute nature of this request; Mr. and Mrs. Worrall had intended to travel to Florida for a brief vacation at the trial’s conclusion, in part to visit Mr. Worrall’s brother and his baby born last week, but did not know when precisely that would be or whether permission to travel would continue to be required. We also note that Mrs. Worrall has been on leave from her job as an assistant principal of an elementary school during the trial but is due to be back at work next week.

We have communicated with Mr. Worrall’s pre-trial services officers in the District of Maryland (with whom he met in person today) and the Southern District of New York, and the officers do not object to this request. We have alerted the government, which likewise does not object to this request.

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*DR. SULTAN ALMASOUD & PARTNERS IN ASSOCIATION WITH SHEARMAN & STERLING LLP

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Respectfully submitted,

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